

EXHIBIT F

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PROPOSED CAAG APPROVAL ORDER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DOUGLAS HALL; STEVEN HEIMOFF;
BOTTLEBRUSH INVESTMENTS, L.P.;
LEGHORN INVESTMENTS LTD.; and
KAMALA D. HARRIS, solely in her capacity as
Attorney General for the State of California,

Defendants.

Adv. Pro. No. 12-01001 (SMB)

**ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY CODE
AND RULES 2002 AND 9019 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE AUTHORIZING TRUSTEE TO SIGN ONTO, ON A LIMITED
BASIS, AN AGREEMENT EXECUTED BETWEEN THE ESTATE OF STANLEY
CHAI AND OTHER DEFENDANTS IN ADVERSARY PROCEEDING NO.
09-01172 ALSO PENDING BEFORE THIS COURT AND KAMALA D. HARRIS,
SOLELY IN HER CAPACITY AS ATTORNEY GENERAL OF THE STATE OF
CALIFORNIA**

Upon the motion (the “Motion”)¹ of Irving H. Picard, Esq. (the “Trustee”) as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 estate of Bernard L. Madoff, seeking entry of an order, pursuant to sections 105(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 et seq. and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure, *inter alia*, requesting authorization for the Trustee to sign onto, on a limited basis, an agreement executed between the Defendants identified in Exhibit A to the Motion and Kamala D. Harris, solely in her capacity as Attorney General of the State of California, in substantially the form annexed to the Motion (the “AG Settlement Agreement”) (ECF No. __); and it appearing that due and sufficient notice has been given to all parties in interest as required by Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure; and the Court having considered the Affidavit of Irving Picard in support of the Motion; and it further appearing the relief sought in the Motion is appropriate based upon the record of the hearing held before this Court to consider the Motion; and it further appearing that this Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and after due deliberation; and sufficient cause appearing therefor; it is

ORDERED, that the Trustee is authorized to sign onto the AG Settlement Agreement on the limited basis set forth in the AG Settlement Agreement; and it is further

ORDERED, that this Court shall retain jurisdiction over any and all disputes arising under or otherwise relating to this Order.

¹ All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Dated: New York, New York

_____, 2016

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE